

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,

Plaintiff,

v.

RAFAEL SANTIAGO,

Defendant.

REDACTED

Criminal Action No. 07- 14 - JNA

INDICTMENT

The Grand Jury for the District of Delaware charges that:

COUNT I

On or about April 17, 2006, in the District of Delaware, RAFAEL SANTIAGO, defendant herein, did knowingly distribute, and possess with intent to distribute, a mixture and substance containing a detectable amount of cocaine, a controlled substance, in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(C).

COUNT II

On or about June 15, 2006, in the District of Delaware, RAFAEL SANTIAGO, defendant herein, did knowingly distribute, and possess with intent to distribute, a mixture and substance containing a detectable amount of cocaine, a controlled substance, in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(C).

NOTICE OF FORFEITURE

Upon conviction of the controlled substance offense alleged in Counts I and II of this Indictment, RAFAEL SANTIAGO, defendant herein, shall forfeit to the United States pursuant to 21 U.S.C. § 853, any property constituting, or derived from, proceeds obtained, directly or



indirectly, as a result of the said violations and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said violations, including but not limited to a sum of money substantially in excess of \$22,000 and the real property known as 501 Maryland Avenue, Wilmington, Delaware.

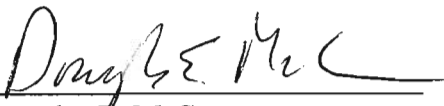
If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
 - (b) has been transferred or sold to, or deposited with, a third party;
 - (c) has been placed beyond the jurisdiction of the court;
 - (d) has been substantially diminished in value; or
 - (e) has been commingled with other property which cannot be divided without difficulty;
- it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property described above.

A TRUE BILL:

Foreperson

COLM F. CONNOLLY
United States Attorney

BY: 
Douglas E. McCann
Assistant United States Attorney

Dated: February 6, 2007